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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 JESSIKAH KIPF,

12 Plaintiff,

13 vs.

14 I.Q. DATA INTERNATIONAL, INC.;
EXPERIAN INFORMATION
15 SOLUTIONS, INC.; TRANS UNION,
LLC; EQUIFAX INFORMATION
16 SERVICES, LLC,

17 Defendants.

Case No.: 2:24-cv-00165-JAD-BNW

**JOINT STIPULATION AND
ORDER EXTENDING
DISCOVERY DEADLINES**

(SECOND REQUEST)

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1 Plaintiff JESSIKAH KIPF (“Plaintiff”), and Defendants I.Q. DATA
2 INTERNATIONAL, INC, (“IQ Data”), EXPERIAN INFORMATION SOLUTIONS,
3 INC. (“Experian”), and EQUIFAX INFORMATION SERVICES, LLC (“Equifax”)
4 (jointly all as the “Parties”),¹ hereby jointly move to extend all deadlines set forth in
5 the Joint Stipulation and Order Extending Discovery Deadlines filed with this Court
6 on October 22, 2024, (ECF No. 26) by a period of ninety (90)

7 In light of the holidays before us, unforeseen and unfortunate circumstances for
8 some of the Parties, and the unavailability of some of the requested deponents, the
9 Parties have had difficulty scheduling requested depositions prior to the discovery
10 cut-off date. It is the Parties’ belief that the requested additional 90 days will alleviate
11 the pressure on dates with the possibility of resolution. The Parties are discussing
12 potential resolution between them all at the moment.

13 The Parties are working in good faith to discuss potential resolution of this
14 matter and have mutually agreed it is in the best interest of all Parties to extend the
15 time while the Parties’ settlement discussions remain ongoing. Resolution discussions
16 have been positive thus far. In addition, the Parties wish to conserve their respective
17 resources as well as the Court’s time and resources on this matter if a resolution can
18 be achieved during this brief extension of time. The Parties are working together in
19 good faith to work out any issues that arise due to the facts of this matter.

20 The Parties in good faith believe more time is necessary to conduct efficient
21 discovery and for the Parties to have effective conversations regarding potential
22 resolution.

- 23 1. On January 24, 2024, Plaintiff filed her Complaint (ECF No. 1), against
24 Defendant IQ Data.
25 2. On April 23, 2024, Plaintiff filed her First Amended Complaint (ECF
26 No. 4), against all Defendants.

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28 ¹ Defendant Trans Union LLC does not join in this motion because it has settled its claims with Plaintiff.

3. IQ Data filed its Answer to Plaintiff's First Amended Complaint on June 20, 2024 (ECF No. 15).
4. Equifax filed its Answer to Plaintiff's First Amended Complaint on July 5, 2024 (ECF No. 17).
5. Experian filed its Answer to Plaintiff's First Amended Complaint on July 5, 2024 (ECF No. 19).
6. The Parties filed a Joint Stipulation and Order extending the Discovery Deadlines on October 18, 2024, (ECF No. 25) ("First Stipulation").
7. The Court granted the First Stipulation on October 25, 2024 (ECF No. 26).
8. This is the Parties' second request.

The Parties have completed the following discovery to date:

- The Parties have exchanged initial disclosures.
- The discovery cutoff deadline has not passed yet, but the Parties have discussed discovery and depositions.

5. The parties still need to conduct depositions, additional written discovery, serve subpoenas, conduct third-party depositions, and conduct expert discovery.

6. The additional time will allow the Parties to conduct extensive and additional fact discovery, including taking depositions, potentially additional written discovery, acquiring all documents from third-parties, resolving any discovery issues, additional time to adequately determine whether expert discovery will be needed in this matter, and workout discrepancies and evidence issues between the Parties.

7. No party will be prejudiced by this Court granting this Stipulation as all Parties jointly seek an extension of these deadlines. Moreover, the Parties believe that allowing the extension will serve the ends of judicial economy.

8. Moreover, the requested extensions are not sought for the purposes of delay.

1 9. Additionally, the Parties believe that further time will alleviate the need for

2 10. This is the Parties' second request to extend these deadlines and its done
3 in good faith and not to unduly delay or prejudice any party.

4 11. Accordingly, the parties request adoption of the following deadlines:

5 **a. Discovery Plan:**

6 Discovery Cut-off **6/16/2025**

7 Deadline to Disclose Expert Disclosures **4/17/2025**

8 Deadline to Disclose Rebuttal Expert Disclosures **5/19/2025**

9 Deadline to File Dispositive Motions **7/15/2025**

10 **b. Pre-Trial Order:** The parties shall file a joint pretrial order no later
11 than **8/18/2025** or thirty (30) days after the date set for filing dispositive motions. In
12 the event that Parties file dispositive motions, the date for filing the joint pretrial
13 order shall be suspended until thirty (30) days after decision on the dispositive motion
14 or further order of the Court.

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WHEREFORE, Plaintiff and Defendants respectfully request this Honorable Court (1) extend discovery in the present matter as set forth above; and (2) reissue a new Scheduling Order to reflect the requested extension.

DATED this 20th day of December 2024.

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ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 12/23/2024

CERTIFICATION OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on December 20, 2024, the foregoing Notice JOINT STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINES was served via CM/ECF to all parties appearing in this case.

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